

DEIS Comments – Response to Agency Comments: 3.25 Pipeline Reliability and Safety
PHMSA Comments - May 23, 2016

Commenter	Section Number	Page	Original Language	Proposed Language or Comment	Disposition (CAs should leave blank)	Comment Addressed Adequately for Final EIS?
PHMSA	3.25 Pipeline Reliability and Safety	3.25-14	To prevent corrosion, the majority of the pipe would be externally coated with a three-layer polyethylene coating before delivery. . . .	<p>A three-layer polyethylene coating is referenced in following DEIS locations:</p> <ul style="list-style-type: none"> • Executive Summary Section 2.2.3.7, page ES-1-16 • Chapter 2: Alternatives, page 2-109 • Chapter 3: Environmental Analysis, 3.25 Pipeline Reliability and Safety, page 3.25-14 <p>a) The compatibility of a three-layer polyethylene pipeline coating system and the pipeline’s cathodic protection system is a concern. Mutli-layer polyethylene pipeline coating systems have a track record of shielding cathodic protection current. In areas of coating defects, such as disbanded coating, the polyethylene coating can prevent (shield) cathodic protection current from reaching the steel pipeline surface. A cathodic protection system will not mitigate corrosion of the steel pipeline surfaces which are shielded from cathodic protection current in disbanded situations. If a 3-layer coating is used, how would cathodic protection surveys such as close interval surveys be conducted to ensure the pipeline is properly protected from corrosion?</p> <p>b) A fusion-bonded epoxy (FBE) pipeline coating system is referenced in DEIS Appendix E – PHMSA Enc B DEIS. What type of pipeline coating system is being considered for this project? FBE and/or three-layer polyethylene?</p>		
PHMSA	3.25 Pipeline Reliability and Safety	3.25-14	In addition to the pipe coating, a current-passive, zinc ribbon cathodic protection system would be used for the length of the pipeline. Zinc ribbon would be installed after pipe lowering-in and before backfill. . . .	<p>A zinc ribbon galvanic anode cathodic protection system is referenced in the following DEIS locations:</p> <ul style="list-style-type: none"> • Executive Summary, Section 2.2.3.7, Page ES-1-16. • Chapter 2, Alternatives, page 2-123 • Chapter 3: Environmental Analysis, 3.25 Pipeline Reliability and Safety, page 3.25-14) <p>a) Verify that the galvanic anodes will not be directly connected to the pipeline and the galvanic anodes will be installed with a means to disconnect the galvanic anodes for the pipeline such that accurate pipe-to-soil potentials can be determined. These systems must have a disconnect from the pipeline so that proper cathodic protection surveys can be conducted along the pipeline.</p> <p>b) What type of cathodic protection system will be used to cathodically protect pipeline sections installed by Horizontal Directional Drilling?</p>		